

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

APPLICANTS: Erickson et al. EXAMINER: Pwu, Jeffrey C.  
SERIAL NO.: 09/808,211 GROUP ART UNIT: 2143  
FILED: March 14, 2001 DOCKET: YOR920000671US1 (8728-451)  
FOR: **SYSTEM AND METHOD FOR A DISTRIBUTED SOCIAL PROXY**

**Mail Stop AF**

Commissioner for Patents

P.O. Box 1450

Alexandria, VA 22313-1450

**PRE-APPEAL BRIEF REQUEST FOR REVIEW**

Examiner:

In response to the Advisory Action dated October 20, Applicant requests review of the final rejection in the above-identified application. No amendments are being filed with this request. This request is being filed with a Notice of Appeal and a Pre-Appeal Brief Request For Review Form (PTO/SB/33).

## REMARKS

Please consider the following reasons for this Pre-Appeal Brief Request For Review. Claims 1, 3-20, 22, and 23 are pending and stand rejected in the above-referenced application. Reconsideration of the rejection is respectfully requested in view of the remarks. Claims 1, 12, and 19 are the pending independent claims and are addressed here.

Claims 1, 3-6, 8-20, 22 and 23 have been rejected under 35 USC 103(a) as being unpatentable over Liou et al. (US 2002/0059395) in view of Leshem et al. (US 6,470,383). The Examiner stated essentially that the combined teachings of Liou and Leshem teach or suggest all the limitations of Claims 1, 3-6, 8-20 and 22-23.

Referring to Claim 1: Claim 1 recites, *inter alia*, “displaying a graphic link having a first end point at the element of the first perspective and a second end point at at least one element of a second perspective and representing an association between the element of the first perspective and the at least one element of a second perspective.” The claimed invention links elements in different perspectives graphically, such that the link represents an association between the elements of different perspectives; using FIG. 3 of the present application as an example, one can immediately tell from the graphic links that the topic “APPLICATIONS” is highly commented by users in Europe. The “TOPICS” perspective of user activity has an element “APPLICATIONS” and the “GEOGRAPHY” perspective of user activity has an element “Europe” associated by a link, and the link itself is representative of the association therebetween. In this regard the combination of Liou and Leshem is clearly not analogous to the claimed invention. Consider the following:

Liou teaches a method for providing a user interface for product exploration and product configuration (see Abstract). Liou teaches tabs for switching between views of product information (see paragraph [0035]). Selecting a tab hides a current perspective and reveals a selected perspective; thus, Liou fails to teach displaying an activity map comprising at least two perspectives. Further, Liou fails to teach or suggest a graphic link connecting the perspectives, much less elements of the perspectives, essentially as claimed in Claim 1. Therefore, Liou fails to teach all the limitations of Claim 1.

Leshem teaches a navigational aid of an Astra graphical user interface (see FIG. 5) and comparison tool (see FIG. 21). Leshem’s display of the navigational aid is a single perspective - a map of websites connected by links (e.g., hyperlinks) (see col. 8, lines 37-42, col. 13, lines 6-

10 and FIG. 1). In view of the comments at pages 3-4 of the Final Office Action; the rejection relies on an interpretation of FIG. 21 as showing a “current map is linked with the compare maps via URLs and links allowing the display of the comparison map data structure.” Respectfully, this interpretation is not supported by the reference; FIG. 21 shows changes to the URLs and links, e.g., whether the URL is new, modified, or deleted, between versions of the same map. FIG. 21 is essentially a track changes representation of a website; there is no teaching or suggestion that a current map is linked with a compare maps “via URLs and links.” Turning to the URLs and links, in FIG. 21 URLs map a structure of a website without application to different perspectives, much less elements of perspectives. An application of the teachings of Lesham to Liou would result in a single perspective view of the structure of Liou’s catalog; Lesham’s method would strip away or flatten the multi-perspective aspects of Liou. There is no teaching or suggestion in either Liou or Lesham of how to achieve a display of at least two perspectives, much less how to link “elements” of perspectives.

Therefore, the combined teachings of Liou and Lesham fail to teach or suggest all of the limitations of Claim 1.

Referring to Claim 12: Claim 12 recites, *inter alia*, “representing the aspect in an activity map including at least two perspectives of the aspect; representing an activity of a user within the environment, wherein the activity corresponds to the aspect and is represented in each perspective simultaneously; and representing the activity of the user as a line rendered between each perspective of the aspect.”

Liou teaches method for providing a user interface for product exploration and product configuration (see Abstract). Liou teaches a literal view of product information (see for example, FIG 1). Liou’s literal view of product information is not “an activity map including at least two perspectives of the aspect.” For example, Liou teaches the use of tabs to switch between individual views - no more than one window corresponding to a selected tab is displayed at any time. Further, the tabs clearly do not represent “the activity of the user as a line rendered between each perspective of the aspect” as claimed in Claim 12. Tabs reveal product information and are unrelated to displaying the activity of a user. Therefore, Liou fails to teach all the limitations of Claim 12.

Lesham teaches a navigational aid of an Astra graphical user interface (see FIG. 5). Lesham’s display of the navigational aid (a website map of links between URLs) is clearly from

a single perspective - that of a map of websites (see col. 8, lines 37-42, col. 13, lines 6-10 and FIG. 1). In the remarks at page 4 of the Final Office Action, the Examiner suggests that the rejection is based on an interpretation of Leshem having “a graphical display representing more than one perspective showing links (line rendering) connected them (see items 288, 290, 292 of fig. 22)”. Applicant interprets this to mean that the Examiner views the dialog box as a “line rendered between each perspective of the aspect”. Respectfully, the interpretation relies on an incorrect claim limitation that substitutes “line rendering” for “line rendered”; the limitation “line rendering” bears no resemblance to the claimed invention or the teachings of the reference. For example, the dialog box displays URLs of missing content objects and links addressing a selected URL of a missing content object (see col. 31, lines 45-59); it is clear that the dialog box is not “a line”. Further, the interpretation fails to address what perspectives the supposed “line” is rendered between. Further still, as described above, Leshem’s link is rendered between URL’s of the same perspective, that of a map, wherein an application of Lesham’s method to Liou would strip away the multi-perspective aspects of Liou.

Therefore, the combined teachings of Liou and Lesham fail to teach or suggest “representing the activity of the user as a line rendered between each perspective of the aspect” as claimed in Claim 12.

Referring to Claim 19: Claim 19 recites, *inter alia*, “displaying at least one different aspect of user activity in each of at least two perspectives of an activity map, wherein the perspectives are associated by the user activity of a market participant, wherein an association between perspectives is represented as a tangible link connecting perspectives, wherein the tangible link is a line having ends points at aspects of the user activity of the market participant represented separately in the at least two associated perspectives of the activity map.”

Liou teaches method for providing a user interface for product exploration and product configuration (see Abstract). Liou teaches a literal view of product information (see for example, FIG 1). Liou’s literal view of product information does not display a “tangible link is a line having ends points at aspects of the user activity of the market participant represented separately in the at least two associated perspectives of the activity map” as claimed in Claim 19. With respect to Claim 19, Liou is clearly deficient; Liou’s tabs are clearly irrelevant to a line between perspectives. Therefore, Liou fails to teach all the limitations of Claim 19.

Leshem teaches a navigational aid of an Astra graphical user interface (see FIG. 5). Leshem's display of the navigational aid is clearly from a single perspective - that of a map of websites, websites connected by links (e.g., hyperlinks) (see col. 8, lines 37-42, col. 13, lines 6-10 and FIG. 1). The URLs and links in FIG. 21 of Lesham map a structure of a website without application to different perspectives. As discussed above with respect to Claim 1, an application of the teachings of Lesham to Liou would result in a single perspective view of the structure of Liou's catalog stripping away the multi-perspective aspects of Liou. That is, displaying two nodes representing different perspectives in a single perspective is not analogous to the claimed display of at least two perspectives; combined teachings of Liou and Lesham would produce a view having only one perspective.

The combined teachings of Liou and Lesham fail to teach or suggest displaying a tangible link as "a line having ends points at aspects of the user activity of the market participant represented separately in the at least two associated perspectives of the activity map" essentially as claimed in Claim 19.

For at least the foregoing reasons, there is believed to be clear error in the rejection of Claims 1, 12 and 19. Claims 3-6, 8-11, 13-18, 20 and 22-23 depend from Claims 1, 12 and 19 and are believed to be allowable for at least the reasons given for Claims 1, 12 and 19. Reconsideration of the rejection is respectfully requested.

For the foregoing reasons, the present application, including Claims 1, 3-20, 22, and 23, is believed to be in condition for allowance. Early and favorable consideration of the application is respectfully requested.

Respectfully submitted,

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